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Attorneys for Plaintiffs
SHAHID BUTTAR FOR CONGRESS COMMITTEE and SHAHID BUTTAR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHAHID BUTTAR FOR CONGRESS
COMMITTEE, et al.,

Plaintiffs,

vs.

HEARST COMMUNICATIONS, INC.,

Defendant.

Case No. 3:21-cv-05566-EMC

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING AND
HEARING SCHEDULE**

Action filed: July 20, 2021

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Shahid Buttar for Congress Committee and Shahid Buttar (collectively, "Plaintiffs") and Defendant Hearst Communications, Inc. ("Defendant") hereby stipulate and respectfully request that the Court approve the following briefing and hearing schedule.

WHEREAS, Plaintiffs filed their complaint in this action on July 20, 2021 (ECF No. 1);

WHEREAS, on Apr. 25, 2022 the Court issued an Order (ECF No. 39) which (a) granted Defendant's Motion to Dismiss, and (b) gave Plaintiffs leave to amend their Complaint;

WHEREAS, Defendant intends to file a Special Motion to Strike Plaintiffs' Complaint after the First Amended Complaint (FAC) has been filed;

1 WHEREAS, on June 15, 2022, the Court issued an Order (ECF No. 43) setting a
2 schedule with respect to the FAC and Defendant's contemplated Special Motion to Strike;

3 WHEREAS, pursuant to that Order, Plaintiffs must file their FAC no later than July 29,
4 2022;

5 WHEREAS, a client emergency in another matter (involving a federal criminal
6 indictment and civil complaint) has arisen for Plaintiffs' counsel; and has required the urgent,
7 time-intensive attention of Plaintiffs' counsel (a solo practitioner);

8 WHEREAS, the Parties have met and conferred regarding the schedule with respect to
9 the FAC and Defendant's contemplated Special Motion to Strike;

10 WHEREAS, extending the deadline for filing the aforementioned documents, as set forth
11 below, will enable counsel to allow for a more complete and orderly presentation of the legal
12 issues the Court will need to resolve;

13 NOW THEREFORE, the Parties hereby stipulate and agree to set the following
14 deadlines:

- 15 1. Plaintiffs' First Amended Complaint will be due on Aug. 12, 2022.
- 16 2. Defendant's Special Motion to Strike and any other responsive pleading will be
17 due on Sept. 23, 2022.
- 18 2. Plaintiffs' Opposition will be due on Oct. 21, 2022;
- 19 2. Defendant's Reply will be due on Nov. 14, 2022; and
- 20 3. The hearing on Defendant's Special Motion to Strike will be held on Dec. 1,
21 2022, 1:30 pm.

1 IT IS SO STIPULATED.

2
3 DATED: July 29, 2022

Respectfully submitted,

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5 BUSINESS, ENERGY, AND ELECTION LAW, PC
GAUTAM DUTTA

6
7 By: /s/ Gautam Dutta
Gautam Dutta

8 *Attorneys for Plaintiffs*

9
10 DATED: July 29, 2022

Respectfully submitted,
11 DAVIS WRIGHT TREMAINE LLP
THOMAS R. BURKE

12 THE HEARST CORPORATION
JONATHAN R. DONNELLAN (admitted *pro hac*
13 *vice*)
DIEGO IBARGUEN (admitted *pro hac vice*)

14
15 By: /s/ Diego Ibarguen

16 *Attorneys for Defendant Hearst Communications,*
17 *Inc.*

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatories have concurred in this filing.

Dated: July 29, 2022

By: /s/ Gautam Dutta
GAUTAM DUTTA

Attorney for Plaintiffs

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 SHAHID BUTTAR FOR CONGRESS
4 COMMITTEE, et al.,

5 Plaintiffs,

6 vs.

7 HEARST COMMUNICATIONS, INC.,

8 Defendant.

Case No. 3:21-cv-05566-EMC

**[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON
DEFENDANT'S SPECIAL MOTION TO
STRIKE**

Action filed: July 20, 2021

9 **[PROPOSED] ORDER**

10 Pursuant to the stipulation of the parties and good cause appearing, it is hereby
11 ORDERED as follows:

- 12 1. Plaintiffs' First Amended Complaint will be due on Aug. 12, 2022.
- 13 2. Defendant's Special Motion to Strike and any other responsive pleading will be
14 due on Sept. 23, 2022.
- 15 2. Plaintiffs' Opposition will be due on Oct. 21, 2022;
- 16 2. Defendant's Reply will be due on Nov. 14, 2022; and
- 17 3. The hearing on Defendant's Special Motion to Strike will be held on Dec. 1,
18 2022, 1:30 pm.
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July __, 2022

Hon. Edward M. Chen
United States District Judge